

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

RAMEL D. THOMPSON, CARL ESTWICK,
JACKIE HARPER, TARYSH G. HOGUE,
RICHARD L. KELLY, LENFIELD
KENDRICK, HENRY T. LEWIS, MICHAEL
A. PERKINS, and MICHAEL A. PERKINS,
JR.,

Defendants.

8:22CR125

UNOPPOSED MOTION TO EXTEND
DEADLINE

COMES NOW Plaintiff United States of America and requests this Court grant a short extension of the pretrial motion deadline from November 6, 2023 so the parties may attempt to reach resolutions short of litigation. In support of this Motion, Plaintiff submits the following.

1. Undersigned counsel has continued to confer by email, phone and in person with counsel for all the Defendants captioned above, in efforts to resolve pending charges short of litigation. Each defense counsel has indicated there is a realistic possibility of resolving charges short of further litigation if there were a short (three or four week) extension of the pretrial motion deadline currently set for November 6, 2023. All agree to such an extension.

2. The requested extension is not for the purpose of delay, but to allow the parties to continue attempts to resolve charges arising from this complex and wide-ranging case on terms the parties assess to be in their interest, thereby avoiding potential miscarriage(s) of justice.

WHEREFORE, Plaintiff requests that the Court:

1. Grant the motion and extend the pretrial motion deadline for approximately three to four weeks from November 6, 2023 as to all Defendants who do not yet have a plea date;

2. Exclude the time between November 6, 2023 and the extended motions deadline, pursuant to 18 U.S.C. § 3161(h)(7); and

3. In the alternative, if the Court determines it will deny the instant Motion, set the matter for pretrial conference pursuant to Rule 17.1 before issuing a trial date, in order to promote a fair and expeditious trial in light of the complexity and wide-ranging nature of this case.

UNITED STATES OF AMERICA, Plaintiff

SUSAN LEHR
Acting United States Attorney
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CERTIFICATE OF SERVICE

I hereby certify that on November 6, 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent notification of such filing to all registered participants.

s/ John E. Higgins
Assistant U.S. Attorney